

LOBEL FINANCIAL – CALIFORNIA PRIVACY POLICY

The State of California requires that we provide privacy information for individuals that reside in California. If you do not reside in California, you can skip this document.

This CALIFORNIA PRIVACY POLICY supplements the information contained in the Consumer Privacy Notice of www.lobelfinancial.com and www.lobelfinancial.net and Lobel Financial Corporation (“Lobel”) collectively, “we,” “us,” or “our”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

1. Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”).

1.1. Personal information does not include:

- a. Publicly available information from government records.
- b. De-identified or aggregated consumer information.
- c. Information excluded from the CCPA's scope, like:

(1) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; or

(2) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

1.2 We obtain the categories of personal information listed above from the following categories of sources:

- a. Directly from our customers or their agents. For example, from documents that our customers provide to us related to the services for which they engage us.
- b. Indirectly from our customers or their agents. For example, through information we collect from our customers in the course of providing services to them.
- c. Directly and indirectly from activity on our website (www.lobelfinancial.com). For example, from submissions through our website portal or website usage details collected automatically.
- d. From third-parties that interact with us in connection with the services we perform.

1.3 Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- a. To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to service your account, we will use that information to properly service your account.
- b. To provide you with information, products or services that you request from us.
- c. To provide you with email alerts and other notices concerning our products or services that may be of interest to you.

- d. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- e. To improve our website and present its contents to you.
- f. For testing, research, analysis and product development.
- g. As necessary or appropriate to protect the rights, property or safety of us, our customers or others.
- h. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- i. As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- j. To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, securitization and/or securitization of assets, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

1.4 Sharing Personal Information

We may disclose your personal information to a third party for a business or commercial purpose. When we disclose personal information for a business or commercial purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We disclose your personal information for a business or commercial purpose to the following categories of third parties:

- a. Our affiliates.
- b. Service providers.
- c. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

1.5 In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected (Yes/No)	Sources of Collected Personal Information (see Section 1.2(a)-(d) and below)	Business or Commercial Purpose for Sharing (See Section 1.3(a)-(j) and below)	Category of Third Parties (See section 1.4(a)-(c) and below)
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	1.2(a) 1.2(b) 1.2(c) 1.2(d)	1.3(a) 1.3(b) 1.3(c) 1.3(d) 1.3(e) 1.3(f) 1.3(g) 1.3(h) 1.3(i) 1.3(j)	1.4(a) 1.4(b) 1.4(c)
B. Personal information	A name, signature, Social Security number, physical characteristics or	YES	1.2(a) 1.2(b)	1.3(a) 1.3(b)	1.4(a) 1.4(b)

categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.		1.2(c) 1.2(d)	1.3(c) 1.3(d) 1.3(e) 1.3(f) 1.3(g) 1.3(h) 1.3(i) 1.3(j)	1.4(c)
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES	1.2(a) 1.2(b) 1.2(c) 1.2(d)	1.3(a) 1.3(b) 1.3(c) 1.3(d) 1.3(e) 1.3(f) 1.3(g) 1.3(h) 1.3(i) 1.3(j)	1.4(a) 1.4(b) 1.4(c)
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	1.2(a) 1.2(b) 1.2(c) 1.2(d)	1.3(a) 1.3(b) 1.3(c) 1.3(d) 1.3(e) 1.3(f) 1.3(g) 1.3(h) 1.3(i) 1.3(j)	1.4(a) 1.4(b) 1.4(c)
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	We do not collect this information	We do not collect this information	We do not collect this information
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO	We do not collect this information	We do not collect this information	We do not collect this information
G. Geolocation data.	Physical location or movements.	YES	1.2(a) 1.2(b) 1.2(c) 1.2(d)	1.3(a) 1.3(d) 1.3(g) 1.3(h)	1.4(a) 1.4(b) 1.4(c)

				1.3(i)	
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES	1.2(a) 1.2(b) 1.2(d)	1.3(a) 1.3(d) 1.3(g) 1.3(h) 1.3(i)	1.4(a) 1.4(b) 1.4(c)
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES	1.2(a) 1.2(b) 1.2(c) 1.2(d)	1.3(a) 1.3(b) 1.3(c) 1.3(d) 1.3(f) 1.3(g) 1.3(h) 1.3(i) 1.3(j)	1.4(a) 1.4(b) 1.4(c)
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	We do not collect this information	We do not collect this information	We do not collect this information
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	We do not collect this information	We do not collect this information	We do not collect this information

1.6 Sale of Personal Information

We do not and will not sell your personal information. We do not and will not sell the personal information of minors under 16 years of age without affirmative authorization.

2. Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

2.1 Access to Categories and Specific Personal Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- a. The categories of personal information we collected about you.
- b. The categories of sources for the personal information we collected about you.
- c. Our business or commercial purpose for collecting or selling that personal information.
- d. The categories of third parties with whom we share that personal information.
- e. The specific pieces of personal information we collected about you (also called a data portability request).
- f. If we disclosed your personal information for a business purpose, a list disclosing the personal information categories that each category of recipient obtained.

We may deny your request for access if we are unable to verify your identity or have reason to believe that the request is fraudulent. We may also deny your request if the personal information is subject to an exemption under Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), California Financial Information Privacy Act (FIPA), or the Driver's Privacy Protection Act of 1994 (DPPA).

2.2 Right to Request Deletion

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- a. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- c. Debug products to identify and repair errors that impair existing intended functionality.
- d. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- e. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
- f. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- g. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- h. Comply with a legal obligation.
- i. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

2.3 Right to Opt-Out

You have the right to opt-out of the sale of your personal information. However, we do not and will not sell your personal information. We do not and will not sell the personal information of minors under 16 years of age without affirmative authorization.

2.4 Right to Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- a. Deny you goods or services.
- b. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- c. Provide you a different level or quality of goods or services.
- d. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

3 Submitting a Verifiable Consumer Request

3.1 Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 833-906-2155
- Website form lobelfinancial.com
- Email: privacy@lobelfinancial.com
- Postal Address: Lobel Financial
Attn: Privacy Notice
P.O. Box 3000
Anaheim, CA 92803

Only: (1) you; or (2) a person authorized by you to act on your behalf; or (3) an entity registered with the California Secretary of State and authorized by you to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

The verifiable consumer request must:

- a. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information. Given the sensitive nature of the personal information we may have collected about you, we will need to verify your identity with at least 3 separate pieces of information such as name, address, account number, date of birth, last 4 of your Social Security Number, phone number, etc.; and
- b. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

3.2 Authorized Agents

Before we can respond to a verifiable consumer request submitted by an authorized agent, we need to confirm not only that person or entity's authority to act on your behalf but also verify the identity of the authorized agent.

If you are authorized to submit a request on behalf of a California resident, please provide the following information:

- a. To verify your authorization to request on behalf of a California resident, please attach a copy of one or more of the following to your request email:
 - i. California Secretary of State authorization; or
 - ii. Written permission from the California resident; or

- iii. Power of attorney
- b. To verify your identity, please attach copies of the following to your request:
 - i. Valid government issued ID (not expired) **AND**
 - ii. A utility bill, bank statement, or similar documentation to verify your name and address.
- c. To verify the identity of the consumer for whom you are submitting the request, please attach **two or more** of the following with your request email (three or more are required when requesting a copy of the California resident's personal information):
 - i. Valid Government Issued ID (not expired),
 - ii. Utility bill,
 - iii. Bank statement,
 - iv. Email address,
 - v. Last 4 of the SSN or
 - vi. Last 4 of the account number

If we cannot verify your identity or authority to make the request and confirm the personal information relates to you, then we cannot respond to your request or provide you with personal information. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

3.3 Response Timing and Format

We will acknowledge receipt of the request within 10 days of its receipt. We will respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

4. Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

5. Contact Information

If you have any questions or comments about this notice, our California Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 833-906-2155
Website: lobelfinancial.com
Email: privacy@lobelfinancial.com
Postal Address: Lobel Financial
Attn: Privacy Notice
P.O. Box 3000
Anaheim, CA 92803

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